

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

GREGORY LEFFEW,

Plaintiff,

Case No. 2:06cv12202

-vs-

Hon. Robert H. Cleland

FORD MOTOR COMPANY, a Delaware
Corporation, UNICARE LIFE AND HEALTH
INSURANCE PLAN, a Delaware Corporation,
and FORD NATIONAL RETIREMENT PLAN,
an employee pension plan,

Referral Judge: Paul J. Komives

Defendants.

K. Scott Hamilton (P44095)
Sherry D. O'Neal (P62288)
DICKINSON WRIGHT PLLC
Attorneys for Defendants Ford Motor Co.
and Ford National Retirement Plan
500 Woodward Avenue – Suite 4000
Detroit, MI 48226
(313) 223-3500

John Joseph Conway (P56659)
JOHN J. CONWAY, PC
Attorney for Plaintiff
645 Griswold
Suite 3600
Detroit, MI 48226
(313) 961-6525

Stephen L. Witenoff (P29815)
Attorney for Defendant UNICARE
400 Galleria Officenter, Suite 550
Southfield, Michigan 48034
(248) 353-4450

**DEFENDANT FORD MOTOR COMPANY'S AND DEFENDANT FORD NATIONAL
RETIREMENT PLAN'S STATEMENT OF NO PROCEDURAL CHALLENGE**

Defendants Ford Motor Company and Ford National Retirement Plan (hereinafter
"Defendants"), by their attorneys Dickinson Wright PLLC, hereby submit that Plaintiff has

raised no procedural challenge to date. Further, as no procedural challenge has been raised by the parties, Defendants submit that no discovery, aside from that required by the guidelines set forth in Wilkins v Baptist Healthcare System, Inc., 150 F.3d 609, 619, (6th Cir. 1998), is required or warranted.

Respectfully submitted,
DICKINSON WRIGHT PLLC
By: /s/Sherry D. O'Neal
Maurice G. Jenkins (P33083)
K. Scott Hamilton (P44095)
Sherry D. O'Neal (P62288)
Attorneys for Ford Motor Company
500 Woodward Avenue, Suite 4000
Detroit, Michigan 48226-3425
(313) 223-3500
SONeal@DickinsonWright.com

Dated: September 20, 2006

CERTIFICATE OF SERVICE

I hereby certify that on September 20, 2006, I electronically filed the foregoing paper with the Clerk of the Court using the ECF system which will send notification of such filing to all counsel of record.

/s/Sherry D. O'Neal
Dickinson Wright PLLC
500 Woodward Avenue, Suite 4000
Detroit, MI 48226-3425
Phone: (313) 223-3500
E-mail: soneal@dickinsonwright.com
P-62288